



Connecticut Association of Optometrists

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[www.cleves.org](http://www.cleves.org)

November 30, 2013

Ms. Victoria Veltri  
State Healthcare Advocate  
P.O. Box 1543  
Hartford, CT 06144

RE: Connecticut State Innovation Model

Dear Ms. Veltri:

The Connecticut Association of Optometrists (CAO) is the professional association in Connecticut representing Optometric Doctors. We are the primary eyecare provider for Connecticut's healthcare consumers. Not only do we care for patients' visual needs, we also care for their medical eyecare needs. In addition, we serve a majority of title XIX patients who have eyecare needs. As such, we have a strong interest in the proposed State Innovation Model and would like to offer comments on the draft plan. We appreciate having this opportunity to do so and look forward to working with you to enhance the quality and scope of healthcare services to consumers in Connecticut.

At the outset, we understand the focus of this innovation model: 1) transforming the practice of primary care so that the full needs of patients can be addressed; 2) improving the linkages between community providers and entities, and 3) empowering consumers. CAO believes these are laudable goals. We further understand the goals will be met with providing measures for increased transparency in costs, a move to value-based payments in lieu of fee-for-service, implementing an all-payor claims data base and information technology standards, as well as several strategies to address the changing demand of the healthcare workforce.

The Connecticut Association of Optometrists would request that as the initiative moves forward, that you create an advisory panel of medical providers who would advise you on the various implementations of the model. We see the healthcare system in operation every day as we treat and interact with our patients, our colleagues, managed care plans and government. We believe medical providers could add a good deal of value to the development of this new model. A formalized advisory role would be warranted. If you would see merit in this idea, the Connecticut Association of Optometrists would like to have a representative on the group.

CAO would also point out that page 150 of the draft ("Quality Measures") indicates the need for diabetic foot care. At the same time, we would suggest you reference the need, in connection with this, for dilated eye examinations since this procedure is a fairly cost-effective and accurate way to detect diabetes.

In conclusion, Connecticut' Optometric Doctors stand ready to assist you with the development and implementation of the Innovation Model. We are the primary portal of entry to the healthcare system for consumers who have vision care needs and believe we can help make this new initiative a success.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian T. Lynch". The signature is fluid and cursive, with the first name "Brian" and last name "Lynch" clearly distinguishable.

Brian T. Lynch, O.D.  
Legislative Chair